

**DECLARATION OF CALVIN FLOWERS**

1. My name is Calvin Flowers. I am a black male. I am over the age of 19 years and am otherwise competent to testify. I have personal knowledge of the matters set forth in this Declaration.

2. In March 2002, I was hired by Honeywell as a Laborer. I am currently a Range Tech and my immediate supervisor is Jerry Temple. I have never heard Mr. Temple use any racial slurs and I believe he is a fair supervisor.

3. I was not close to Curley Young when he was employed with Honeywell and we are not friends outside of work. Mr. Young had a poor attitude when he was employed with Honeywell and when he did not get his way he was very loud and complained a lot. There were many times when I asked Mr. Temple, why he would argue with Mr. Young, I suggested he should just "put a pen to paper" meaning he should write-up Mr. Young or fire him.

4. Since Mr. Young left Honeywell, morale is a lot better because Mr. Young is not around yelling and sharing his attitude and we do not have to perform his work for him.

5. I work with Chris Hines as a Range Tech. Mr. Hines is nothing like Mr. Young. Mr. Hines is easy to get along with and is a hard worker.

6. At one time I applied for a Light Equipment Operator position, but was not hired because I did not possess a CDL license. I am aware that my Project Manager, Mr. Erickson, approached the Army and asked for an exception to this requirement on my behalf, but the Army would not alter the requirement.


7. I later applied for the Range Tech position that Mr. Hines was awarded. Mr. Hines scored higher than I did on the test. While I was disappointed at first, I understand that


Mr. Hines had a higher score. Mr. Erickson assured me that he would try to get me the next Range Tech position and he did so on March 21, 2005. At that time, I was the only applicant and met the minimum qualifications.

8. I never asked Mr. Young to speak with Mr. Erickson about the fact that I was not awarded the Range Tech position that Mr. Hines was awarded. I am not aware that Mr. Young actually spoke to Mr. Erickson about the situation, although I am aware that he tried to claim the credit when I was awarded the Range Tech position in March 2005.

Further declarant saith not.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE ABOVE AND FOREGOING IS TRUE AND CORRECT.

  
Calvin Flowers

  
Date